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STATUS OF FARM LABOR UNDER
STATE WORKMEN'S COMPENSATION LAWS

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The Labor Hazard in Agriculture

In recent years the hazardous nature of farm work has been amply shown. "Estimates of fatalities and injuries for 1937 indicate that there were, 4,500 fatalities in agriculture, 13,500 permanent injuries and 252,000 temporary disabilities. The total fatalities for agriculture exceed that of any other major occupational group. Expressed in terms of fatalities per million workers, the fatality rating for agriculture exceeds the ratings for manufacturing, public utilities, wholesale and retail trade, and services and miscellaneous industries."^{1/}

Although it is probably true that accident hazards predominate in the industrial centers, statistics show that the urban sections are controlling their accident hazards more effectively than the rural communities. In 1936, for the country as a whole, 5,500 agricultural workers met accidental death as compared with 2,700 in construction, 2,300 in trade and miscellaneous service industries, 2,100 in manufacturing, 1,700 in transportation and public utilities and 1,700 in mining, quarrying, oil and gas operation. ^{2/} In Ohio during the period 1926-1934, when the large number of industrial establishments of the State were making steady reduction in accident frequency and severity as payroll exposure dwindled, the experience of agriculture was in the opposite direction. In 1926 the agricultural group filed only 572 injury claims on a payroll of \$7,701,080; in 1933 there were 1,077 injury claims for a payroll of \$5,141,142 and in 1934, 1,206 claims were made on a payroll of \$5,620,149, with the probability that employment on farms had not materially increased. In 1935, accident claims in agriculture mounted to 1331 and included 17 fatalities. ^{3/}

It is commonly believed that accidents which occur on the farm are usually of a minor nature. The experience in a number of States reporting such accidents does not warrant this belief. Thus, accident claims filed in Ohio during the year 1929 showed that one fatal accident out of 202 was reported for all industries combined, but one out of 61 claims in the farm groups. Since it is probable that there is less tendency to report minor accidents on the farm than in industry, a comparison was made of the accidents where no time was lost. Even so, the report showed one fatal accident out of 77 for all industries combined, but one out of 42 claims in the farm groups. ^{4/}

In Massachusetts, the Department of Industrial Accidents, weighting industrial disabilities on a varying basis of man-days lost in accordance with

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- ^{1/} Marshall Dawson, Survey Report (unpublished), Bureau of Labor Statistics, U. S. Department of Labor.
- ^{2/} Max D. Kossoris and Swen Kjaer, "Industrial Injuries in the United States during 1936", Monthly Labor Review, July 1938, Bureau of Labor Statistics, U. S. Department of Labor, Table 1, p. 20.
- ^{3/} Bulletin of the Industrial Commission of Ohio, "Accident Experience of Ohio Agriculture," prepared by the Division of Safety and Hygiene, Ohio, July 15, 1936.
- ^{4/} Bulletin of the Department of Industrial Relations and the Industrial Commission of Ohio, "The Farmer and Farm Accidents", October 8, 1930.

the severity, computed that during the year July 1, 1936 to June 30, 1937, out of a total of 49,594 man-days lost through accidents sustained in agricultural pursuits, 24,000 were lost through fatalities. 1/ That is, 50 percent of the man-days lost through disability on the farm were due to the death of the injured. In Kansas, although the percentage of fatalities in agriculture has declined in recent years, farm accident deaths was still 36 per cent of all occupational fatalities in 1937. 2/ The most frequent cause of fatal injury in this State was the use of farm machinery. The causes of fatal farm accidents in Kansas and the number charged to each were as follows: 3/

agricultural machinery	19	excessive heat	4
injured by animals	16	lightning	4
vehicular accidents	16	burns	4
accidental falls	12	excessive cold	1
crushed by falling trees	5	other causes	2
			Total
			83

Long hours, physical weariness, sudden or frequent shifting of work from one type to another and increased use of machinery have exposed farmers to the occupational hazards in the industry. Many persons are permanently injured by unguarded machinery used in agriculture or semi-agricultural pursuits. The operation of portable firewood saws by farmers, for example, has proved to be so hazardous that a workmen's compensation commissioner has characterized such machines as "veritable butcher shops." 4/

Legal Coverage

Despite the well established hazardous character of farming, workmen's accident compensation laws, expressly or impliedly, generally do not cover employees engaged in this occupation. This is the greatest single gap in effective workmen's compensation coverage. The limitations upon farm coverage in the different States vary considerably. In part, such limitations arise out of the diverse economic and social situations in the jurisdiction, but to a considerable extent they are traceable to experimentation and to compromises between groups interested in compensation legislation. In general it has been observed that "the real reasons for the exemption of farm laborers are political, nothing else." 5/ Little or no union organization among agricultural

1/ The weights used were:

- 1 death = loss of 6,000 man-days.
- 1 permanent temporary disability = loss of 6,000 man-days.
- 1 permanent partial disability = loss of about 1,000 man-days.
- 1 temporary total disability = loss of about 34 days.

See Report of the Department of Industrial Accidents, Mass., July 1, 1938, table IV. p.8.

2/ It was 50 per cent in 1934; 47 per cent in 1935 and 42 percent in 1936.

3/ Kansas State Board of Health, "Kansas Accidental Deaths, 1937."

4/ Marshall Dawson, op. cit.

5/ Willard C. Fisher, "Some Defects and Suggested Changes in Workmen's Compensation Laws", in the Proceedings of the Conference on Social Insurance, Association of Industrial Accident Boards and Commissions, Dec. 1916, published by the Bureau of Labor Statistics, U. S. Department of Labor, Bull. No. 212, 1917, p. 367.

workers, and the absence of other effective means of bringing their wishes to the attention of legislators have been prominent factors bearing on this situation. 1/ Moreover, farm employers have been legally exempted from the operation of workmen's compensation laws of most States because of their opposition to be included and because of the general belief that their inclusion would defeat the compensation acts.

In many States numerical exemptions "would automatically bar from coverage most of the persons engaged in farming, even if they were not named as exempt. But there are also specific exclusions, the list of which usually begins with farmers, domestic servants and casual workers." 2/ Thus, the laws of nine States, of the Territory of Alaska and of the Philippines Islands 3/ expressly exclude farm workers from their benefits without affirmatively giving the employer of such labor the option of taking out insurance subject to the provisions of the workmen's compensation acts. It appears, therefore, that the exclusion of farm workers is intended to be absolute in these jurisdictions:

Alabama	Oklahoma	Texas
Iowa	Pennsylvania <u>4/</u>	West Virginia
New Hampshire	Tennessee	Wyoming <u>5/</u>

The laws of 24 additional States and the District of Columbia likewise expressly exclude farm employers and farm workers from their coverage. They differ from the nine preceding States in so far as they permit farm employers voluntarily to come under the coverage of the compensation act. These States are:

<u>6/</u>		
Arizona	Kansas	North Dakota
Arkansas	Kentucky <u>6/</u>	Nevada
Colorado	Maryland	Rhode Island
Delaware	Minnesota <u>6/</u>	South Carolina
Florida	Missouri	South Dakota <u>6/</u>
Georgia	Nebraska	Utah
Idaho	New York <u>6/</u>	Virginia
Indiana	North Carolina	Wisconsin

1/ Ibid.

2/ Marshall Dawson, op. cit.

3/ Includes farm workers in the operation of mechanical implements.

4/ In Pennsylvania the provision in the law of 1915 enabling employers of agricultural workers to come under the compensation act by application to the Workmen's Compensation Board was repealed in 1937.

5/ Includes workers engaged in power farming.

6/ These States, however, specifically include farm labor engaged in the general or commercial use of machinery.

The laws of the States of Illinois and Oregon specifically state that agricultural pursuits are non-hazardous and that compensation provisions do not apply to persons engaged in farming. However, agriculture in these two States may also be covered under the provisions of the act by the affirmative election of the farm employer.

Finally, four other States - Louisiana, Montana, New Mexico and Washington - do not include agriculture in the enumerated extra-hazardous employments which are covered under their acts, but under their laws may be so defined. The border line between agricultural and industrial employment is not determined precisely and from time to time the courts are called to interpret the coverage provisions. For example, in Louisiana farming may be named as a hazardous occupation either by agreement between employer and employee or by submission at the instance of either employer or employee to the Judge of the Court which has jurisdiction over the employer in a civil case.

Another category of laws proceeds in a more positive direction. Those of the States of Maine, Massachusetts and Michigan do not exclude farming, but the defenses of contributory negligence, fellow servant's fault and assumption of risks are not abrogated with reference to workers in this occupation as they are in the case of other employments. That is, under the elective workmen's compensation laws of each of these three States, any employer who does not take out workmen's compensation insurance loses three of his main defenses (contributory negligence, assumption of risk, negligence of fellow employee) if one of his workers is injured and sues him at common law. The only employers who do not lose these defenses are employers of farm laborers who may use them in refusing to pay damages for injuries sustained by their employees or for death met by them in the course of performing work on the farm.

In comparison with the workmen's compensation laws of the 42 States, of Alaska, Philippine Islands and the District of Columbia, the laws of the remaining five States, of Puerto Rico and Hawaii may be said to be slightly more potentially hospitable to the admission of agricultural workers under their protection. With varying lengths of the strings attached, the laws of California, Connecticut, Ohio, New Jersey, Vermont, Puerto Rico and Hawaii cover agricultural employments.

The California statute, which is not compulsory for employers of farm labor, presumes their acceptance in the absence of notice of rejection of the compensation provisions. Such presumption of election, however, does not apply to farm operators whose payroll had not exceeded \$500 in the preceding calendar year. In Connecticut farm operators who regularly employ five or more hands and in Vermont those who employ eleven or more farm workers are presumed to accept the provisions of the act in the absence of written stipulation to the contrary in the contract of hiring or in written notice from either party to the other, or to the commissioner in charge of workmen's compensation. Employing farmers of less than the numerical minimum in each of these two States may elect to come under the act by furnishing to the Compensation Commissioner satisfactory proof of their solvency and financial ability to pay directly to an injured employee the compensation provided in the provisions of the act.

In Ohio the act is compulsory for farming occupations, but only where three or more agricultural workers are employed. In Puerto Rico the same rule applies, excepting that four or more employees are the minimum for coverage. In each of these jurisdictions farmers employing less than the numerical minima may voluntarily pay into the State insurance fund the premiums provided by the act and obtain coverage.

The New Jersey and Hawaii acts seem to be exceptions to the general practice of excluding farm employments either expressly or by the numerical minimum coverage device. Although the New Jersey act is compulsory only for public employments, acceptance of the provisions of the act by employers in private industry is presumed in the absence of written rejection from either party to the other or express statement to the contrary in the contract of hire, and, therefore, has the force of compulsion. But such apparent inclusiveness is weakened by a provision exempting farmers from such automatic acceptance of the provisions of the law. In Hawaii all private employments carried on for gain are covered under the compulsory law, excepting casual work or employment not for the purpose of employer's business and excepting employees receiving over \$36 a week.

Finally, a few States require workers engaged in extra-hazardous farm tasks or mechanized farm processes to be insured under their workman's compensation act. In New York farm labor in the commercial operation of baling and threshing machines, grain elevators, traction engines, motor trucks and horse-drawn vehicles are covered under the compulsory law, provided the farm operator or contractor employs four or more workers. Similarly, in South Dakota, where the act is presumed to cover private employments in the absence of notice to the contrary, the operation of threshing machines, of grain combines, corn shellers, corn huskers, shredders, silage cutters and seed hullers is covered under the compensation law, but only if engaged on a commercial basis or by contract. If such machinery is owned and operated by the farmer himself in relation to his own grain crops or by those who are not generally engaged in the operation of such machines for commercial purposes or in operations in the nature of exchange work between farmers, the provisions for coverage do not apply. The same situation prevails in Minnesota. In this State farm laborers, who are generally excepted from the compulsory features of the act, are defined to exclude employees of commercial threshermen or balers. The latter are defined to be persons going about from place to place threshing grain, shredding or shelling corn, or baling hay or straw as a business. Farmers owning threshing, shredding, shelling or baling machines not engaged in such business generally and doing their own threshing, etc., or casually doing such work for other farmers in the same community, and farmers exchanging work among themselves are not classed as commercial threshermen or balers. In other words, coverage in such cases is determined not by the hazard of the process, but by the industrial classification of the person who operates the machines.

In Arizona, farm labor using machinery must be insured, provided the farm operator regularly employs three or more workers, while in Kentucky operators of threshing machines used in threshing and hulling grain or seeds are specifically covered if they employ three or more farm hands. In Kentucky the employer elects to come under the law by filing written notice with the

Workmen's Compensation Board and the employee, by signing a notice to be filed with his employer. In 1931 farm employees regularly engaged in the operation of mechanical implements, but whose remuneration, 1/ exclusive of overtime pay, is in excess of 42 pesos 2/ a week, were included under the compulsory act of the Philippine Islands; and in 1937 power farming in Wyoming was added to the list of extra-hazardous occupations covered under its compulsory act. For the purpose of the act, however, power farming in Wyoming was defined as a farm on which the usual farming operations are substantially all performed by tractor-drawn or motor-driven machinery and trucks, and where five or more workmen are regularly employed for an average of six months each year.

Table 1 shows the legal status of farm workers in the various States having workmen's compensation laws.

1/ Includes commercial value of the board and lodging, subsistence, fuel and other things that can be reckoned in money.

2/ About twenty dollars.

TABLE 1 Legal Status of Farm Workers in the States Having Workmen's Compensation Laws
(as of March, 1939)

Specifically excluded. 1/	Specifically exempted but voluntary acceptance permitted.	Specifically excluded in the enumerated extra-hazardous employment. 8/	Not excluded but employer's defenses allowed. 8/	Included.
Alabama	Arizona 4/	Illinois	Maine	California 9/
Alaska	Arkansas	Oregon	Massachusetts	Connecticut 10/
Iowa	Colorado		Michigan	Hawaii
New Hampshire	Delaware			New Jersey
Oklahoma	Florida			Ohio 11/
Pennsylvania	Georgia			Puerto Rico 12/
Philippine Islands 2/	Idaho			Vermont 13/
Tennessee	Indiana			
Texas	Kansas			
West Virginia	Kentucky 5/			
Wyoming 3/	Maryland			
	Minnesota 6/			
11 States	24 States	2 States	3 States	7 States

1/ With the possible exception of the laws in these States, the excluded or exempted employments can usually be brought within the compensation acts by application, election or the taking out of insurance.

2/ Includes employers operating mechanical implements used in agriculture.

3/ Includes workers engaged in power farming.

4/ Farm laboring machinery must be insured and are covered under the law, provided the farm operator employs three or more workers.

5/ Operators of threshing machines used in threshing or hulling grain or seeds are specifically covered.

6/ Includes farm workers of commercial threshermen or balers.

7/ Farming in which grain combines, corn huskers, shredders, silage cutters and seed huskers are operated commercially is covered under the law.

8/ Under the acts of these States farm operators who do not elect to come under the law may use defenses of contributory negligence, fellow servant's fault and assumption of risk in refusing to pay damages for personal injuries sustained or for death met during the course of performing work on farm.

9/ Except where employer's payroll had not exceeded \$500 in the preceding year.

10/ Except farm operators employing less than five employees.

11/ " " " " three

12/ " " " " four

13/ " " " " ten

Actual Farm Labor Coverage

Since farm workers have been legally exempted from the operation of workmen's compensation laws of most States, interest centers around the extent of voluntary acceptance of compensation laws by farmers in the States providing for such acceptance and in the States having compulsory laws which do not exclude agricultural employments. Unfortunately very little information is available on this point. Very few States provide any data on the extent of farm coverage. It is generally assumed that a very small proportion of farmers have taken out compensation insurance for the benefit of their employees and for their own financial protection. What little evidence exists supports this assumption.

In Ohio the Industrial Commission reported that on July 1, 1935 approximately 2,150 Ohio farmers¹ were insured under the workmen's compensation act of the State. ² What proportion of the total number of employing farmers of the State did these insured farmers represent? The 1930 Census of Agriculture showed that about 41 per cent of Ohio farms reported an expenditure for labor in 1929. Assuming this percentage to have been the same in 1935, it would appear that there were about 105,000 Ohio farmers who employed some help that year. It would seem, therefore, that about one in 50 farmers employing help availed himself of the protection offered by the act in 1936. That is, in spite of the compulsory provisions for coverage, only two per cent of the farm employers insured their liability with the State fund.

In Utah and Oregon the data on farm coverage are more complete. In Oregon the Industrial Accident Commission reported that in the calendar year 1936 an average of about 6500 agricultural workers engaged in general farming were covered under the provisions of the act. In 1937 the average number increased to approximately 7400. Farm policies under the act represented a payroll exposure of nearly five million dollars in 1936 and slightly over six million dollars in 1937. The agricultural premium income in the former year equaled about \$166,000 and disbursements for claims amounted to slightly over \$214,000; in the latter year the respective figures were \$204,000 and \$224,000. ³

The Industrial Commission of Utah reported that in the fiscal year 1937 an average of 281 farm workers were covered under the workmen's compensation act, and that in the fiscal year 1938 it had risen to 295. In each of these years the farm coverage equaled slightly less than two per cent of the total number of insured workers under the act. The agricultural payroll under the act amounting to about \$651,000 and the agricultural premium income of \$17,700 for the two fiscal years combined were less than four-tenths of one per cent of the total payroll exposure and of the total premium receipts, respectively. Table 2 shows these figures in detail.

¹/ No figures are available on the number of farm workers employed by these insured farmers.

²/ Industrial Commission of Ohio, Division of Safety and Hygiene, "Accident Experience of Ohio Agriculture", 1936.

³/ From a special tabulation submitted to the Farm Security Administration by the Chief Accountant of the Industrial Accident Commission of Oregon.

TABLE 2

Payroll Classification, Premium and Compensation Cost
of Farming Subject to the Workmen's Compensation Act of Utah ^{1/}

Type of farming	Fiscal year ending June 30	Average number of employees covered	Number of man-hours of exposure	Payroll (dollars)	Premium (dollars)
General farming	1937	203	475,734	231,719	6,845
	1938	211	487,284	249,338	8,225
Florists, cultivating or gardening	1937	72	168,823	75,349	964
	1938	81	188,443	86,941	1,235
	1937			106	5
Landscape gardening	1938			218	11
	1937	6	13,728	4,579	266
Farm machinery operation	1938	3	6,785	2,754	179
	1937	281	658,285	311,753	8,080
Total, farming	1938	295	682,512	339,251	9,650
	1937	77,954	172,233,451	95,587,056	2,290,783
Total, all industries	1938	81,858	179,615,288	102,333,326	2,553,728

^{1/} Includes data of the State fund, stock companies and self-insurers.

Source: Biennial Report of the Industrial Commission of Utah, Bulletin No. 3, July 1, 1936 to June, 1938.

While farm laborers employed in the operation of power-driven machinery were covered under the workmen's compensation act of Puerto Rico as early as 1916, not until 1925 were agricultural workers in general included. Today only those farm laborers working for employers of one to three workmen are not protected by the compulsory insurance. But "this numerical exemption does not affect a great many agricultural workers since most of them are employed in sugar cane operations 1/ and other types of farming in which at least four workers are hired." 2/ In fact "since 1925 there has been virtually full coverage of farm work on the Island." 3/

Of the 6,019 policies which were issued in Puerto Rico in 1935, 3,920 or 65 per cent covered agricultural employers. Farm policies represented a payroll exposure of \$15,189,456 or 32 percent of the total payroll covered under the act. Premium income from these farm policies amounted to \$615,156 or 54 per cent of the total premium receipts. 4/

Cost of Farm Insurance

It is generally realized that an important factor responsible for the limited farm coverage in those States permitting farmers to elect to come under the provisions of the law is the high cost of insurances.

An examination of the rates charged by private insurance companies for covering general farming in the various States in 1938 would reveal that the modal average is between two and three dollars per hundred dollars of payroll and the minimum annual premium required is as high as fifty dollars. In Idaho, Montana and New Mexico minimum premiums are \$100; in New York the minimum is as high as \$115. In the States of Nevada, Oregon, Washington and Wyoming the minimum is \$75.

In California the rates computed by the State insurances fund in 1939 vary according to the type of farming. Thus, for cotton, hop, potatoes, poultry, sugar beet and truck farms and vineyards the minimum premium for an employer is \$50 per year, for dairy farms, \$75, for stock farms, \$77, for sheep raising, \$84, and for farms operating machinery by contractors, \$103. The Oregon State Fund has no minimum premium, but the rate for general farming in 1938 was \$3.50 per hundred dollars of payroll, plus an additional one cent per day for each workman employed. An investigation by the Bureau of Labor Statistics in 1935 revealed that collections of premiums was difficult although in some cases the annual premium charged was less than 50 cents. 5/ Even where exclusive State funds have extended coverage to farmers on a voluntary basis, without making the burdensome minimum premium charge which is customary with private insurance carriers, few farmers have taken

1/ The domestic and foreign economy of Puerto Rico is founded on agriculture, the principal crops being sugar cane, coffee and tobacco. The sugar cane industry, however, has the greatest effect on the Island's finances.

2/ Marshall Dawson, Survey Report (unpublished), Bureau of Labor Statistics, United States Department of Labor.

3/ Ibid.

4/ Ramon Montaner, "Workmen's Compensation in Puerto Rico- The Exclusive State Insurance Fund", in the 1936 Proceedings of the Convention of the International Association of Industrial Accident Boards and Commissions, Discussion of Industrial Accident and Disease. Division of Labor Standards, United States Department of Labor, 1937, Bulletin No. 10, pp. 46-47.

advantage of the privilege and collection of assessments from the insured farmers has proved difficult.

In Ohio, largely because of the worsening of farm accident experience between 1926 and 1933, the rate for general farming, including dairy and stock farms, rose from \$2.00 to \$4.00 per hundred dollars of payroll, and remained at this level until 1936. During the same period the rate in the operation of threshing machines, shellers and hay balers rose from \$5.50 to \$6.80 per hundred. The reasons for these increases are clearly apparent when it is known that in the five-year period, January 1, 1930 to December 31, 1934, Ohio farmers paid into the State insurance fund premiums totalling \$677,131, while during the same period the losses due to accidents and paid from the fund amounted to \$813,631. In view of this experience, the Industrial Commission concluded that the farmers in Ohio "have put forth comparatively little effort to control the mounting costs of accidents by applying the principles of prevention. Apparently they are not yet fully convinced of the value of safety, either as a venture in human welfare or as an economic proposition." 1/

Recommendations and Conclusions

As far back as 1916, Royal Meeker, then United States Commissioner of Labor Statistics, recommended that "all States should provide adequate compensation to all workers receiving less than a stated yearly wage in all industries. Farm and domestic labor should be provided for because of their great importance and the numbers employed in these occupations. The hazardous or non-hazardous nature of these industries has nothing to do with the question of including them under compensation. The cost of accidents has to be borne anyhow. The only sensible thing to do is to provide for carrying it most economically and thoroughly." 2/

More recently, the Fifth National Conference on Labor Legislation adopted a report of the Secretary of Labor's Committee on the Extension of Labor Law Protection to all Workers which included a recommendation that workmen's compensation provisions be applied to agricultural workers: "Farmers should be protected against damage suits, and workers injured in farming should be assured regular compensation and medical care in the same manner as workers in other occupations." 3/

Another committee at the Conference, the Committee on Prevention and Compensation of Industrial Accidents and Diseases, recommended that all industries and all employees should come under workmen's compensation acts, and that "there should be no exemption of small employers or non-hazardous

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- 1/ Bulletin of the Industrial Commission of Ohio, "Accident Experience of Ohio Agriculture ", July 15, 1936.
 - 2/ Royal Meeker, "The Relations of Workmen's Compensation to Old Age, Health, and Unemployment Insurance", in the Proceedings of the Third Annual meeting of the International Association of Industrial Accident Boards and Com-missions, April, 1916, pub. by the Bureau of Labor Statistics, U. S. Department of Labor, Bul. No. 210, May, 1917, p. 245.
 - 3/ U.S. Department of Labor, Division of Labor Standards, Reports of Comm-itees and Resolutions adopted by Fifth National Conference on Labor Legislation, November, 1938. Bulletin 25-A, Washington, D. C., 1938, p. 4.

industries or occupations." 1/ While the Committee recommended that compensation acts be generally compulsory, it suggested that coverage for agricultural workers may be either compulsory or elective.

The above recommendation that coverage "should" be inclusive is one of many similar ones which has appeared from time to time in compensation literature. The farm laborer, whose wage is small or intermittent and whose living is precarious, urgently needs the protection of a workmen's compensation law. The first step is to bring him under its provisions; the second, to make that coverage effective.

According to the findings of the survey by the Bureau of Labor Statistics, "the experience of the past twenty-five years has shown that under existing conditions and with present insurance practices it has not been possible for the carriers, whether public or private, to cover farm employments except by taking a loss on certain occupations or establishments . . . To a considerable degree . . . restrictions upon coverage reflect practical insurance difficulties under existing conditions". 2/ High accident frequency on the farm which has resulted in high insurance costs has proved to be a barrier to a more inclusive coverage of farm workers. It is apparent that effective farm coverage is not obtainable in the absence of a comprehensive program of supervisory and preventive activities, adequately administered. The extension and improvement of safety service by public and private agencies would reduce accident costs and consequently make feasible a more inclusive farm coverage than now prevails.

The Industrial Commission of Ohio has stated that "the steady increase of accident frequency and severity on farms makes some organized safety effort imperative if agricultural insurance premium rates are to be maintained at their present level and a start made toward an experience that will mean reductions." 3/ The Commission also pointed out that the set-up in the agricultural classification is ideal for organized safety work through the granges, farm bureaus, cooperatives and youth organizations which effectively contact a large proportion of the employing farmers.

Finally, studies of the Bureau of Labor Statistics lead to the conclusion that industrialized types of farming are susceptible to safety programs which effect a saving of life and a lowering of insurance rates to a bearable level. They show that certain sugar croporations in Florida have "extremely well developed safety organizations" and minimum accident experience. 4/

1/ Ibid, p. 18.

2/ Marshall Dawson, op. cit.

3/ Industrial Commission of Ohio, op. cit.

4/ Marshall Dawson, op. cit.

